

EXHIBIT A

Declaration of Todd Richardson

UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA

JUDITH D. GUILLORY, individually, as the
mother of MICHAEL JOHN GUILLORY and as
the Administratrix of the ESTATE OF
MICHAEL JOHN GUILLORY, Deceased,

Plaintiffs,

vs.

LAS VEGAS METROPOLITAN POLICE
DEPARTMENT, CLARK COUNTY, a political
subdivision of the State of Nevada, CITY OF
LAS VEGAS, a political subdivision of the State
of Nevada, Z. CHRISTON (P#17276), Sgt. E.
HUTCHASON (P#12955), Sgt. J. BONAGUIDI
(P#7967), COMMUNITY AMBULANCE,
EMTS DOES I – V, DOES VI – L, and ROES LI
– LX,

Defendants.

Case No.: 2:23-CV-02010-JCM-BNW

**DEFENDANT RBR MANAGEMENT
dba COMMUNITY AMBULANCE'S
REPLY IN SUPPORT OF MOTION TO
DISMISS PLAINTIFFS' AMENDED
COMPLAINT**

I, TODD RICHARDSON, declare as follows:

1. I am Director of Health and Safety at Community Ambulance.
2. I am making this Declaration in Support of Community Ambulance's Motion to Dismiss Plaintiff's Amended Complaint.
3. I have personal knowledge of this matters set forth in this Declaration and can testify as a competent witness if called upon to do so.
4. At all times relevant to the Plaintiff's claims as outlined in the Amended Complaint, Community Ambulance was acting pursuant to the Emergency Medical Services Protocols of Southern Nevada Health District pursuant to NRS 450(B).
5. The Southern Nevada Board of Health District has a Medical Advisory Board comprised of numerous medical providers who developed the protocols, including David Obert, DO, of Community Ambulance.

6. The Medical Advisory Board approved Behavioral Emergency protocols are included and specifically allow for the administration of Ketamine for patients exhibiting excited delirium and the flow chart of those protocols is attached to my declaration as Exhibit A-1.
7. Community Ambulance was dispatched for a LVMPD standby and according to Community Ambulance's Prehospital Care Report Summary, Mr. Guillory was exhibiting excited delirium.
8. Community Ambulance administered Ketamine accordingly.

I declare under the penalty of perjury under the laws of the State of Nevada, and of the United States of America that the foregoing is true and correct.

Executed this 17th Day of May, 2024 in Clark County, Nevada.

/s/ Todd Richardson
TODD RICHARDSON

**SCHNITZER JOHNSON &
WATSON CHTD.**
Attorney & WATSON
8985 S. Eastern Ave., Suite 200
Las Vegas, Nevada 89123

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